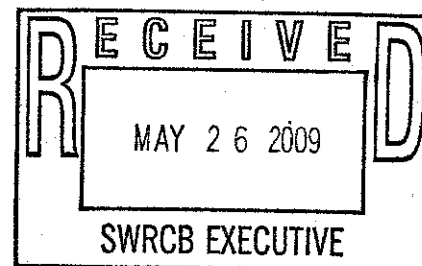


Tel to 341-5252

FRIENDS OF THE NORTH FORK7143 Gardenvine Ave.
Citrus Heights, California 95621

May 26, 2009

Jeanine Townsend, Clerk of the Board
California State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812Re: General Permit (AB 1481)
Recycled wastewater for landscape irrigation

Dear Ms. Townsend:

Friends of the North Fork opposes the environmentally irresponsible implementation of the Recycled Water Policy that is proposed by the AB 1481 General Permit.

The failure to prepare a CEQA Environmental Impact Report for the policy or in the absence of an EIR on the policy, for this General Permit, is an unnecessary and dangerous experiment on the waters, lands and plant communities including habitat of the California environment in violation of CEQA.

Counsel who negotiated against the recycled water policy environmental stakeholders made a presentation on March 3, 2009 to a section meeting of the Sacramento County Bar Association. I asked them to what extent discharges into sewer systems under the Industrial Pretreatment Program were considered and they said that this was not a concern of the recycled municipal wastewater stakeholders.

The Board is relying on a stakeholder group of limited membership and interest instead of bringing its own resources to bear. The industrial pretreatment program is but one of many programs and policies that are directly relevant to the recycled water policy.

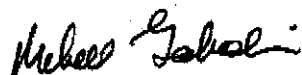
The policy and general permit are a case of regulatory failure as well as failure to factor industrial pretreatment and other programs into their development, including as part of the CEQA process.

The policy relies on state health agency implementation of their authority for recycled wastewater, yet authorities of this nature are waived in the general

permit and waived authority seems to have conditions substituted for it in the permit, all absent CAQA analysis.

The board in this permit action proposes building a house of cards with an inadequate policy foundation. We believe that this policy failure will lead to exponential increases in environmental problems that also pose an unnecessary threat to the responsible use of recycled water.

Sincerely,



Michael Garabedian, President
916-719-7296